

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**CARRINGTON MORTGAGE SERVICES, LLC'S  
MOTION FOR EXTENSION OF TIME TO RESPOND**

Carrington Mortgage Services, LLC (“Carrington”), pursuant to Fed. R. Bankr. P. 9006(b)(1), respectfully moves this Court for an extension of time through and including May 1, 2020, to respond to Debtor Mark A. Richards’ (“Debtor”) Motion for Contempt, Return of Debtor’s Funds And to Set Aside Certain Real Estate Transactions, filed on March 16, 2020 (the “Motion”), and in support states as follows:

1. On or around March 23, 2020, Carrington received notice of Plaintiff's Motion, which seeks certain extraordinary relief including, *inter alia*, setting aside prior loan modifications, ordering the return of mortgage payments, affirmative damages, and sanctions. (Doc. No. 31).

2. Although captioned and styled in what appears to be an adversary proceeding, no such adversary complaint has been filed by Debtor. Nor has Debtor requested this Court reopen the current case so that he can file any pleading seeking affirmative relief, such as the Motion.

3. It is unclear in this District whether a motion to re-open the case must be filed prior to seeking affirmative relief as Debtor attempts to do here.

4. Therefore, out of an abundance of caution, Carrington respectfully requests additional time through and including May 1, 2020, to file a response to the Motion, or respond as otherwise directed by the Court.

5. The requested extension of time is not sought for purposes of harassment or delay, and this Carrington's first request for extension of time in this case.

6. Pursuant to Fed. R. Bankr. P. 9006(b)(1), Carrington respectfully requests that the Court in its discretion and for cause shown extend any deadline for Carrington to respond to Debtor's Motion for Contempt, Return of Debtor's Funds And to Set Aside Certain Real Estate Transactions through and including May 1, 2020.

Dated this 2nd day of April, 2020.

**HOLLAND & KNIGHT LLP**

/s/ Grant Edward Lavelle Schnell  
Grant Edward Lavelle Schnell  
Georgia Bar No. 106794

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*Counsel for Carrington Mortgage Services,  
LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically submitted the foregoing **CARRINGTON MORTGAGE SERVICES, LLC'S MOTION FOR EXTENSION OF TIME TO RESPOND** to the Clerk of Court using the CM/ECF system which will automatically send electronic mail notification of such filing to counsel of record who are CM/ECF system participants, and mailed a paper copy of same mailed by the United States Postal Service, first-class, postage prepaid, to parties and counsel of record who are non-CM/ECF participants, properly addressed upon:

Mark A. Richards  
1861 Windsonr Creek Dr.  
Conyers, GA 30094

*Via U.S. Mail Only*

This 2nd day of April, 2020.

**HOLLAND & KNIGHT LLP**

/s/ Grant Edward Lavelle Schnell  
Grant Edward Lavelle Schnell  
Georgia Bar No. 106794